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October 1, 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Hand Delivered

Re: Petition for Waiver
CC Docket Nos. 96-128/and 91-35

Dear Mr. Caton:

Transmitted herewith, on behalf of TDS Telecommunications Corporation and its local exchange carrier subsidiaries, are an original and four copies of its Petition for Waiver of certain provisions in the Report and Order and Order on Reconsideration in the above-referenced dockets.

In the event there are questions concerning this matter, please contact me.

Very truly yours,



R. Edward Price

Enclosure

cc (w/encl) by hand delivery:
Robert W. Spangler
Rose M. Crellin
Greg Lipscomb

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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OCT - 1 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Implementation of the)	CC Docket No. 96-128
Pay Telephone Reclassification)	
and Compensation Provisions of the)	
Telecommunications Act of 1996)	
)	
Policies and Rules Concerning)	CC Docket No. 91-35
Operator Service Access and)	
Pay Telephone Compensation)	
)	
Petition of the Public Telephone)	
Council to Treat Bell Operating Company)	
Payphones as Customer Premises)	
Equipment)	
)	
Petition of Oncor Communications)	
Requesting Compensation for)	
Competitive Payphone Premises)	
Owners and Presubscribed Operator)	
Services Providers)	
)	
Petition of the California Payphone)	
Association to Amend and Clarify)	
Section 68.2(a) of the)	
Commission's Rules)	
)	
Amendment of Section 69.2(m))	
and (ee) of the Commission's Rules)	
to Include Independent Public)	
Payphones Within the "Public)	
Telephone" Exemption from End User)	
Common Line Access Charges)	

PETITION FOR WAIVER

TDS Telecommunications Corporation (TDS), by its attorneys and on behalf of its local

exchange carrier (LEC) subsidiaries,¹ hereby petitions the Commission for a temporary waiver, until July 1, 1998, of the provisions in the Report and Order (FCC 96-388) and Order on Reconsideration (FCC 96-439) in the above-captioned proceeding requiring payphone service providers (PSPs) to transmit certain digits with automatic numbering information (ANI) to interexchange carriers (IXCs) as part of the FCC's payphone call compensation plan. This waiver is necessary for the reasons discussed herein.

The Report and Order requires PSPs to provide a discrete code with the automatic numbering identification (ANI) they transmit to IXCs with each call. These codes will enable IXCs to track compensable calls and compensate PSPs accordingly. See Report and Order, FCC 96-388 (released Sept. 20, 1996), ¶ 98. This requirement is scheduled to go into effect on October 7, 1997. See Order on Reconsideration, FCC 96-439 (released Nov. 8, 1996), ¶ 114. However, as a consequence of the need for TDS employees to deal with several other pressing regulatory issues and technological problems during the past several months — such as implementation of the FCC's order pertaining to carrier identification codes (Second Report and Order, FCC 97-125, CC Docket No. 92-237 (released Apr. 11, 1997)) — TDS has only recently been able to evaluate and determine the most suitable method for its subsidiaries to use in transmitting the required digits with payphone ANI. The method TDS has chosen, mostly because it can be implemented much faster than other methods, is the Line Information Database (LIDB) method.

TDS is now in the process of negotiating and entering into agreements with LIDB


¹ A list of the TDS LEC subsidiaries on behalf of which this Petition is made is appended hereto as Attachment 1.

suppliers. Once these agreements are finalized, TDS will need to test this transmission method with IXC's, including AT&T, which have been selected by its subsidiaries. TDS believes that a test can be conducted before the end of 1997. Following this essential test, assuming it is successful, TDS estimates that it will take approximately six months to begin transmitting the required information to IXC's.

In order to properly test and install the correct system, TDS therefore requests that the Commission grant an extension of the October 7, 1997, deadline until July 1, 1998, for the TDS subsidiaries to comply with the Report and Order.

Respectfully submitted,

TDS TELECOMMUNICATIONS
CORPORATION

By: 
Margot Smiley Humphrey
R. Edward Price

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Suite 1000
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(202) 467-5700

Its Attorneys

October 1, 1997

TDS TELECOMMUNICATIONS CORPORATION
LOCAL EXCHANGE CARRIER SUBSIDIARIES

Amelia Telephone Corporation
Arcadia Telephone Company
Arizona Telephone Company
Arvig Telephone Company
Asotin Telephone Company
Badger Telecom, Inc.
Barnardsville Telephone Company
Black Earth Telephone Company, Inc.
Blue Ridge Telephone Company
Bonduel Telephone Company
Bridgewater Telephone Company
Burlington, Brighton and Wheatland Telephone Company
Butler Telephone Company, Inc.
Calhoun City Telephone Company, Inc.
Camden Telephone & Telegraph Company
Camden Telephone Company
Central State Telephone Company
Chatham Telephone Company
Chichester Telephone Company, Inc.
Cleveland County Telephone Company, Inc.
Communication Corporation of Michigan
Communications Corporation of Indiana
Communications Corporation of Southern Indiana
Concord Telephone Exchange, Inc.
Continental Telephone Company
Danube Telephone Company
Decatur Telephone Company
Delta County Tele-Comm, Inc.
Deposit Telephone Company, Inc.
EastCoast Telecom, Inc.
Edwards Telephone Company, Inc.
Goshen Telephone Company
Grantland Telecom, Inc.
Grove Hill Telephone Corporation
Hampden Telephone Company
Happy Valley Telephone Company
Hartland & St. Albans Telephone Company

Home Telephone Company
Home Telephone Company, Inc.
Hornitos Telephone Company
Humphreys County Telephone Company
Island Telephone Company
Kearsarge Telephone Company
Leslie County Telephone Company
Lewis River Telephone Company
Lewisport Telephone Company
Little Miami Communications Corporation
Ludlow Telephone Company
Mahanoy & Mahantango Telephone Company
McClellanville Telephone Company, Inc.
McDaniel Telephone Company
Meriden Telephone Company, Inc.
Mid-America Telephone, Inc.
Mid-State Telephone Company
Midway Telephone Company
Mt. Vernon Telephone Company
Myrtle Telephone Company Inc.
Nelson-Ball Ground Telephone Holding, Inc.
New Castle Telephone Company
New London Telephone Company
Northfield Telephone Company
Norway Telephone Company
Oakman Telephone Company, Inc.
Oakwood Telephone Company
Oklahoma Communication Systems, Inc.
Orchard Farm Telephone Company
Oriskany Falls Telephone Corporation
Peoples Telephone Company
Perkinsville Telephone Company, Inc.
Port Byron Telephone Company
Potlatch Telephone Company
Quincy Telephone Company
Riverside Telecom, Inc.
Salem Telephone Company, Inc.
Saluda Mountain Telephone Company
Scandinavia Telephone Company
Service Telephone Company, Inc.
Shiawassee Telephone Company

Somerset Telephone Company
Southeast Mississippi Telephone Company
Southwestern Telephone Company
St. Stephen Telephone Company
Stockbridge & Sherwood Telephone Company, Inc.
Strasburg Telephone Company
Sugar Valley Telephone Company
Tellico Telephone Company, Inc.
Tennessee Telephone Company
Tenney Telephone Company
The Home Telephone Company of Pittsboro, Inc.
The Island Telephone Company
The Stoutland Telephone Company
The Vanlue Telephone Company
Tipton Telephone Company
Troy Telephone Company, Inc.
UTELCO, Inc.
Vernon Telephone Company
Virginia Telephone Company
Warren Telephone Company
Waunakee Telephone Company, Inc.
West Penobscot Telephone & Telegraph Company
Williston Telephone Company
Winsted Telephone Company
Winterhaven Telephone Company
Wolverine Telephone Company
Wyandotte Telephone Company